

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**UNITED STATES SECURITIES AND
EXCHANGE COMMISSION,**

Plaintiff,

v.

JOHN A. PAULSEN,

Defendant.

Civil Action No. 1:18-cv-6718 (PGG)

Plaintiff's Witness List

Pursuant to Fed. R. Civ. P. 26(a)(3)(A)(i) and the Court's Individual Rules of Practice in Civil Cases X(A)(9), Plaintiff SEC sets forth the following list of "witnesses whose testimony is to be offered in its case in chief." All SEC witnesses will testify by declaration and deposition designation and, if requested by Defendant Paulsen, may be cross-examined via video in accordance with the Court's Individual Rules of Practice in Civil Cases X(C)(3) for bench trials.

Witnesses Plaintiff Expects to Present in its Case in Chief:

Navnoor Kang
Deborah Kelley
Scott Shiffman
Elizabeth Baird
Donald Jones
Ann Tushaus (SEC staff member – summary witness)

Witnesses Plaintiff May Call if the Need Arises for Rebuttal or Authentication:

Alllen Oppici
Andrew RoCHAT
Jon Walker
Sherene Chou
John Paulsen
Sterne Agee / Stifel document custodian
NYSCRF document custodian

Date: June 29, 2020

Respectfully submitted,

UNITED STATES SECURITIES AND
EXCHANGE COMMISSION

/s/ Alyssa A. Qualls

Alyssa A. Qualls (AQ4247)

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Brian D. Fagel, Illinois Bar No. 6224886

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